

**No. PD-0715-17  
IN THE COURT OF CRIMINAL APPEALS OF TEXAS**

FILED  
COURT OF CRIMINAL APPEALS  
6/27/2018  
DEANA WILLIAMSON, CLERK

**FROM THE COURT OF APPEALS FOR THE  
FOURTEENTH DISTRICT COURT OF APPEALS  
HOUSTON, TEXAS  
No. 14-15-00502-CR**

**JOSEPH SMITH  
APPELLANT**

**On Appeal from Cause Number 1336966  
From the 228<sup>th</sup> District Court  
Harris County, Texas**

**V.**

**THE STATE OF TEXAS  
APPELLEE**

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**COUNSEL'S MOTION FOR LEAVE TO FILE A REPLY**

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TO THE HONORABLE JUDGES OF THE COURT OF CRIMINAL APPEALS:

COMES NOW, the Appellant, by and through his attorney Sarah V. Wood, and files this Motion for Leave to File a Reply and in support thereof, would respectfully show the Court the following:

**I.**

After PDR was granted, Mr. Smith filed his brief on April 11, 2018. The State filed its brief on May 30, 2018.

**II.**

Counsel submits the attached reply, which is very brief, as it may aid this Court in its decision. This reply is filed concurrently with this motion.

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PRAYER

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WHEREFORE, PREMISES CONSIDERED, appellant respectfully prays that this Court grant this motion and allow a Reply Brief to be filed.

Respectfully Submitted,  
**ALEXANDER BUNIN**  
Chief Public Defender  
Harris County, Texas

/s/ Sarah V. Wood  
**SARAH V. WOOD**  
Assistant Public Defender  
Harris County, Texas  
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing motion to file a reply has been served on the District Attorney of Harris County, Texas, by the efile service and to the State Prosecuting Attorney.

/s/ Sarah V. Wood  
Sarah V. Wood